

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|-----------------------------|---|------------------------------|
| ASLAM SHAHID, |) | |
| |) | |
| Plaintiff, |) | |
| |) | Case No. 15 C 8330 |
| v. |) | |
| |) | Honorable John Robert Blakey |
| GOVERNORS STATE UNIVERSITY, |) | |
| |) | |
| Defendant. |) | |

**DEFENDANT’S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO
ANSWER OR OTHERWISE PLEAD TO
PLAINTIFF’S FOURTH AMENDED COMPLAINT**

NOW COMES Defendant Governors State University (“GSU”), by and through its attorney, LISA MADIGAN, Attorney General of the State of Illinois, and pursuant to Federal Rule of Civil Procedure 6(b), request that this Court enter an order extending the time for GSU to answer or otherwise plead to Plaintiff’s Fourth Amended Complaint up to and including October 19, 2016. In support of its unopposed motion, GSU states as follows:

1. On September 22, 2015, Plaintiff Aslam Shahid (“Plaintiff”) initiated this lawsuit against GSU for race, religious, and national origin discrimination in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.* and Ancestry Discrimination in violation of 42 U.S.C. § 1981 based upon EEOC Charge No. 440-2015-02777. ECF No. 1.

2. On June 22, 2016, the Equal Employment Opportunity Commission (EEOC) issued a second Dismissal and Notice of Rights to Plaintiff.

3. On September 21, 2016, Plaintiff filed his Fourth Amended Complaint pursuant to Rule 15(a)(2) with Defendant’s written consent to include allegations of race discrimination, religious discrimination, national origin discrimination and retaliation in violation of Title VII

based upon EEOC Charge No. 440-2015-00720 . ECF No. 29.

4. There appears to be a discrepancy regarding whether Plaintiff has been issued a Dismissal and Notice of Rights for EEOC Charge No. 440-2016-00720 as the Notice issued to Plaintiff on June 22, 2016 lists EEOC Charge No. 440-2015-02777. Pl.'s Fourth Am. Compl. Ex. 6.

5. Pursuant to Rule 15(a)(3), GSU's answer or responsive pleading is due by October 5, 2016. Counsel for GSU respectfully requests additional time to investigate the claims made by Plaintiff, and to respond accordingly.

6. GSU respectfully requests up to and including October 19, 2015 to answer or otherwise plead to Plaintiff's Fourth Amended Complaint.

7. The requested extension is sought in good faith and not for the purposes of undue delay or prejudice.

8. This is GSU's first request to extend the deadline to answer or otherwise plead to Plaintiff's Fourth Amended Complaint.

9. Counsel for Plaintiff has no objection to this motion.

WHEREFORE, GSU respectfully requests that this Honorable Court grant an extension of time to answer or otherwise plead to Plaintiff's Fourth Amended Complaint, up to and including October 19, 2016, and grant such other relief as the Court finds reasonable and just.

LISA MADIGAN
Attorney General of Illinois

Respectfully submitted,

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